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July 11, 2005

# VIA ELECTRONIC FILING AND OVERHIGHT UPLE COPY ORIGINAL

Ms. Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 9300 East Hampton Drive Capitol Heights, MD 20743

RE: Notice of Ex Parte Communication, In the Matters of IP-Enabled Services; E911
Requirements for IP-Enabled Service Providers, WC Dockets Nos. 04-36 and 05-196

Dear Secretary Dortch:

In accordance with the Commission's *ex parte* rules, <sup>1</sup> RNK, Inc. d/b/a RNK Telecom ("RNK") hereby gives notice in the above-captioned proceeding of an *ex parte* communication with the Commissioners and a Commission Staff member. Specifically, on July 11, courtesy copies of the attached press release regarding the launch of RNK's "Edison" product, a GPS-enabled E911 solution for nomadic VoIP users, were sent to Chairman Kevin J. Martin, Commissioner Kathleen Q. Abernathy, Commissioner Michael J. Copps, Commissioner Jonathan Adelstein, and Ms. Janice Myles of the Wireline Competition Bureau, Competition Policy Division.

This filing is being made electronically in accordance with the Commission's Rules.<sup>2</sup> Please date-time stamp the copy of this letter marked "Duplicate" upon receipt and return in the postage-paid envelope provided.

Sincerely

Matthew T. Kinney

Legal Asst./Regulatory Analyst

Enclosure

No. of Copies rec'd 09

147 CFR §1.1206

<sup>&</sup>lt;sup>2</sup>Electronic Filing of Documents in Rulemaking Proceedings, 63 Fed. Reg. 24121 (1998) at ¶5.



JUL 1 3 2005

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## **FAX TRANSMISSION SHEET**

4 pages (including cover)

To: Ms. Janice Myles, FCC Comp. Policy Bureau (Fax: 1-202-418-2825)

From: Jordan Malik, RNK Telecom

RE: E911/VoIP Press Release

Date: July 11, 2005

Dear Ms. Myles:

Following please find a press release by RNK Telecom, released on Thursday July 7, 2005. The topic of the release is RNK Telecom's initiative to provide E911 services to VoIP providers.

Sincerely,

Jordan B. Malik, Director of Marketing

RNK Telecom

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JUL 1 3 2005

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Nathan Wilcox, NENA Chair, VoIP/Packet Committee, Fax: (802)828-4109 wilcox@e911.psd.state.vt.us

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JUL 1 3 2005

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## RNK to Launch E911 VoIP Solution

Ahead of FCC Mandate, RNK Ushers in New Era of VoIP with GPS-Enabled E911 Technology

Contact:
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rich@rnktel.com

Dedham, MA – July 7, 2005 – RNK Telecom today announced it will launch Edison, its E911 solution. Edison will be a potentially "life saving" emergency calling solution for RNK's voice over Internet protocol (VoIP) resellers.

Edison is a GPS-enabled solution that will connect between a user's phone and VoIP connection, ensuring E911 systems continuously receive precise and updated information about the VoIP caller's location.

"Edison is one of many products RNK is pouring R&D funds into," said Richard Koch, co-founder and CEO of RNK. "We've been testing Edison for many months now, and it will prove that RNK isn't just a phone company. Edison can save the lives of VoIP callers."

Unlike traditional Plain Old Telephone Service (POTS) customers, VoIP callers – often defined as nomadic users – frequently take their VoIP devices with them in a move or on the road without informing their phone company. With inaccurate or incomplete data of the caller's whereabouts, an E911 system is unable to pinpoint a nomadic user's exact location, which can foil an emergency rescue and put the caller's life at risk.

"In the first phase, RNK's Edison will relay the nomadic user's precise geographical location, enabling RNK to quickly know if the user's VoIP unit has been moved." Koch continued. "This addresses the FCC's concern that customers need not self-report their location when they move."

"In a subsequent phase of development, Edison will provide updated geographical location to the appropriate E911 systems via a pseudo-ANI. RNK will simultaneously update the emergency ALI database, providing the end user's address and phone number," Koch concluded.

Additional examples of nomadic users whom may benefit from RNK's Edison solution:

- A farm owner who has a single street address but a VoIP connection in another building

- An RV driver who has a single street address but is 'mobile' and can be anywhere in the nation

RNK's announcement comes just five weeks after the FCC mandated that all VoIP providers must provide enhanced 911 services within 120 days. RNK is beta-testing Edison, and plans to formally launch the service in 30-60 days.

RNK is the exclusive distributor of Edison, and has the worldwide rights to market and sell the Edison E911 hardware, software and systems. GPS One Star Inc., a leading developer, manufacturer and service provider in the Global Positioning Satellite (GPS) marketplace, powers Edison's basic GPS functionality.

Dan Hirby, founder of One Star, said "One Star is pleased to have an exclusivity agreement with RNK to integrate our patent-pending GPS devices into a full nomadic E911 VoIP solution."

#### About Edison

As a robust phone company and leading VoIP wholesaler, RNK has several thousand VoIP users relying on its outstanding connectivity solutions. While providing E911 services in its footprint now, RNK has committed extraordinary resources toward developing Edison ahead of the FCC's mandate.

Once implemented, RNK'S Edison system will self report both geographical information and street address of the end VoIP user. Here's how:

In RNK's initial phase of Edison, a stand alone GPS device is connected between an end user's VoIP adapter and broadband connection. Edison, at specified intervals, sends the exact location (longitude, latitude and altitude) of the device and to RNK's secure database servers. The information transfer is done over the Internet and does not rely on cell towers or other current GPS reporting methods.

When an end user first registers for VoIP service, his self reported location is matched with the corresponding GPS information sent by the Edison device. If the self reported information and the GPS information are within the same proximity, the customer's profile is earmarked in RNK's database. If the two information sources are outside proximity parameters, RNK notifies the end user, and a settlement is sought. Example: If, upon registering for VoIP service, a customer tells RNK he is in Washington, D.C., but the Edison system pinpoints him in Long Island, he will be contacted to settle his location for his E911 profile.

Once the settlement is established, the Edison solution will constantly update RNK's user database. The end user is always urged to inform RNK of any anticipated movement or relocation of the Edison device and his VoIP phone or ATA adapter. But if the end user fails to inform RNK of a move, RNK will know either: 1.) the unit has been turned off and on; and/or 2.) if the device is reporting significantly different geographic

information than what was initially reported by the end user. When RNK becomes aware of any such changes, it will contact the end user to verify the move and obtain updated E911 address information, and attempt to repopulate its databases.

### About RNK

RNK Inc., d/b/a RNK Telecom, is a global telecommunications services wholesaler founded in 1992 and headquartered in Dedham, MA. Through its unmatched operational efficiency, industry expertise and technical innovation, RNK Telecom delivers superior products and profit margins to broadband providers, carriers and retail distributors worldwide.

RNK VoIP, a division of RNK Telecom, is the VoIP private label wholesaler for broadband providers, UNE-P providers, CLECs, cable providers and entrepreneurs. When its roots as a telephone company are combined with the company's technical innovation and operational efficiency, RNK VoIP delivers superior products and profit margins to its customers.

For additional information call 888-642-9831 or visit www.rnktel.com, or www.RNKVoIP.com.